

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE

GLEND A ATKINS, CHRYSTAL)	
AKRIDGE, DARPHELIA AKRIDGE,)	
DORIS GOODNER, AND CHICA)	
ALEXANDER.)	
)	Civil Action No.3:13-cv-00562
Plaintiffs,)	
)	Judge Kevin H. Sharp
v.)	
)	Magistrate Judge Juliet Griffin
LQ MANAGEMENT, LLC D/B/A)	
LA QUINTA INN AND SUITES)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR PAGE EXTENSION FOR DEFENDANT’S MOTIONS
FOR SUMMARY JUDGMENT**

Defendant, LQ Management L.L.C. d/b/a La Quinta Inn and Suites ("Defendant" or "La Quinta") respectfully requests a page extension for each of its separate Motions for Summary Judgment in light of the multitude of legal issues presented in this matter. Defendant submits that its request for an additional five (5) pages is necessary to adequately address each of the claims raised by each individual Plaintiff. Plaintiffs are seeking damages available under the Tennessee Human Rights Act ("THRA") for "a hostile work environment, discrimination in employment, and for retaliation." Plaintiffs later amended their Complaint to include allegations that Plaintiffs Crystal Akridge ("C. Akridge") and Doris Goodner ("Goodner") were wrongfully terminated in retaliation for "complaining and ultimately filing this lawsuit." Defendant's analysis of each Plaintiff's individual claims has extended beyond the twenty (20) page limit for each individual Motion for Summary Judgment, due to the number of claims presented by each Plaintiff and the number of legal defenses involved.

Defendant further submits that no Motion contains repetition or inappropriate argument,

and there is no other means by which they could be shortened. This Court has the inherent power to manage its own docket and allow for extensions of page limits, when appropriate. *See, e.g., Bahr v. Technical Consumer Products, Inc.*, 2014 WL 1094426, *5 (N.D. Ohio 2014) (“It is well settled that federal district courts have the inherent power to manage their own dockets”). This Motion will not prejudice Plaintiffs.

Accordingly, Defendant respectfully requests that the Court grant its request for an additional five (5) pages for each of its separate Motions for Summary Judgment.

Dated this 13th day of May 2014.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

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CERTIFICATE OF SERVICE

I certify that on May 13, 2014, a copy of the foregoing was served via the Court's electronic filing system upon the following:

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s/ Charlotte S. Wolfe
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